

EXHIBIT H

(Document Produced in Wolf Litigation)

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

TODD WOLF,

Plaintiff,

Case No. 23-cv-149

v.

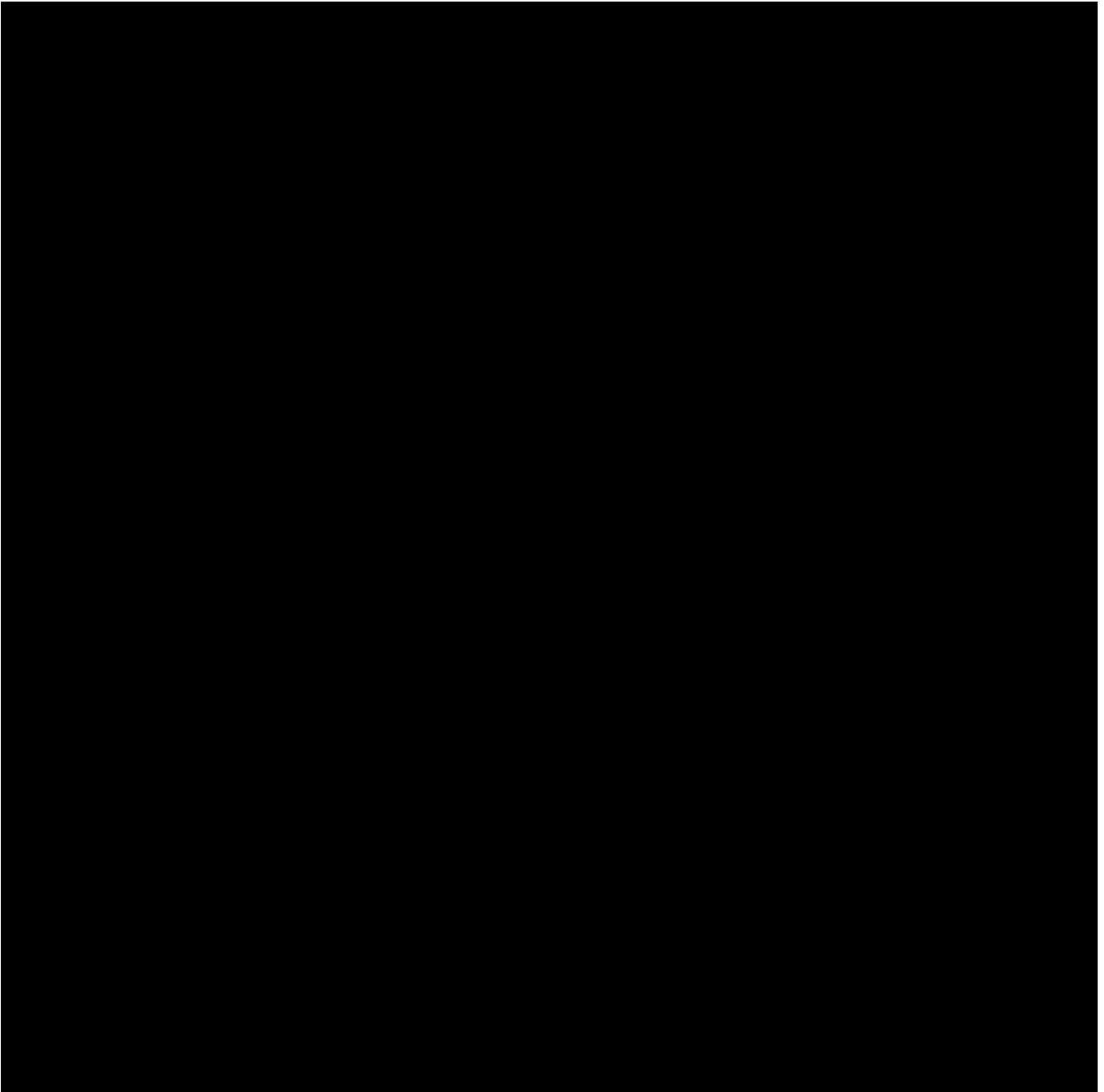
CITY OF SHEBOYGAN, MAYOR RYAN
SORENSEN in his individual and official
capacities, CITY ATTORNEY CHARLES
ADAMS in his individual and official capacities,
ALDERPERSONS ON SHEBOYGAN'S
COMMON COUNCIL, BARBARA FELDE,
ROBERTA FILICKY-PENESKI, AMANDA
SALAZAR, ANGELA RAMEY, BETTY
ACKLEY, ZACHARY RUST, DEAN DEKKER,
GRAZIA PERRELLA, all in their individual and
official capacities; SHEBOYGAN AREA
SCHOOL DISTRICT BOARD MEMBER
MARY LYNNE DONOHUE, in her individual
and official capacities; MAYA HILTY, and JILL
PEDIGO HALL,

Defendants.

**DEFENDANT CHARLES ADAMS'S RESPONSES AND OBJECTIONS TO
PLAINTIFF TODD WOLF'S INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

TO: Jennifer DeMaster
DeMaster Law LLC
361 Falls Road, #610
Grafton, WI 53024
attorney@jennifermaster.com

NOW COMES Defendant Charles Adams ("Defendant"), and provides the following
responses to Plaintiff, Todd Wolf's Interrogatories and Requests for Production of Documents.



INTERROGATORY NO. 2: Identify with particularity each and every person that you communicated with on November 7, 2022, (“November 7 directives”) relating to Todd Wolf, his administrative leave, leave directives, and/or investigation, including exactly how you were directed or ordered or provided with the language for the directives served on Todd Wolf. Include with your response:

- a. The full name of the person you communicated with and how you communicated (phone, zoom, text, email, in person, etc.).
- b. The approximate time you communicated with them.
- c. Which number, account, email, etc. you communicated with them on (if it was not an in person communication).
- d. The estimated time and duration of your communication, where applicable.
- e. A brief description of the communication with particularity.

ANSWER: Defendant Adams objects to this Interrogatory to the extent that it violates the attorney/client privilege and to the extent that it requires disclosure of the thoughts, impressions, and opinions of Defendant Adams, and thereby violates the attorney work product doctrine. Defendant Adams will not provide information regarding statements made during any Common Council closed sessions about Plaintiff or the matters referenced in this Interrogatory. Defendant Adams further objects to this Interrogatory to the extent it seeks information prepared in anticipation of litigation. Plaintiff has not made the required showing pursuant to Federal Rule of Civil Procedure 26(b)(3) that he has a substantial need of the materials in the preparation of this case and that he is unable without undue hardship to obtain the substantial equivalent of the materials by other means.

Subject to and without waiving his objections, Defendant Adams states as follows:

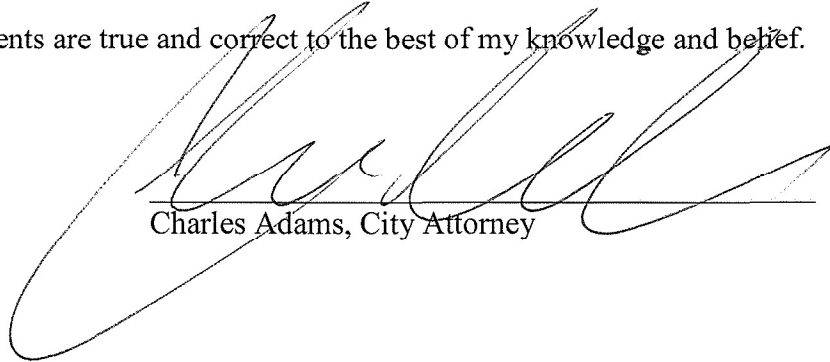
- a. At the end of the November 7 closed session meeting, the Alderpersons instructed Defendant Adams to prepare a letter to Plaintiff setting forth the Common Council's expectations of Plaintiff while he was on paid administrative leave. Defendant Adams asked his paralegal, Marie Foss, to draft the November 7 letter to Plaintiff. Defendant Adams, Mayor Sorenson and ACA Majerus reviewed the draft and made final revisions.
- b. See answer to (a) above.

- c. Not applicable. The communication was in person.
- d. See answer to (a) above.
- e. Common Councils direction regarding the content of the letter was general. They asked that the letter advise Plaintiff to cooperate with the investigation, advise him that he was not authorized to speak on behalf of the City, notify him that he was required to stay off City premises to protect employees and to give him a chance to get his things.

INTERROGATORY NO. 3:

VERIFICATION

I, Charles Adams, do hereby verify, certify and state that the factual information contained in the foregoing Response to Plaintiff's First Set of Interrogatories and Requests for Production of Documents are true and correct to the best of my knowledge and belief.



Charles Adams, City Attorney